



UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2020 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

ARLAN WESLEY HARRELL,  
aka "soole,"  
"fritters,"  
"kronos," and  
"the dread king," and  
JOHN RICHARD BRINSON JR.,  
aka "king,"  
"iamking,"  
"boyanal," and  
"devinelover,"

Defendants.

CR 17-404(B)-AB

S E C O N D  
S U P E R S E D I N G  
I N D I C T M E N T

[18 U.S.C. § 2252A(g): Engaging in a Child Exploitation Enterprise; 18 U.S.C. § 2251A(b)(1): Obtaining Custody of a Minor For Purposes of Producing Child Pornography; 18 U.S.C. §§ 2251(a), (e): Production of Child Pornography; 18 U.S.C. §§ 2252(a)(4)(B), (b)(2): Possession of Child Pornography; 18 U.S.C. § 2253 and 28 U.S.C. § 2461(c): Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 2252A(g)]

[ALL DEFENDANTS]

A. THE CHILD EXPLOITATION ENTERPRISE

1. At relevant times, defendants ARLAN WESLEY HARRELL, also known as ("aka") "soole," "fritters," "kronos," and "the dread king,"

1 and JOHN RICHARD BRINSON Jr., aka "king," "iamking," "boyanal," and  
2 "devinelover" were members of an Internet-based, members-only  
3 bulletin board, identified herein as "Website A," the purpose of  
4 which was, among other things, the production, advertisement,  
5 transportation, receipt, distribution, and possession of child  
6 pornography.

7 2. At relevant times, Website A was dedicated to individuals  
8 who have a sexual interest in infants and young children ranging in  
9 age from birth to five years old. Website A was divided into  
10 sections, which included, among others, "Babies (0-1 yo)," "Toddlers  
11 (2-5 yo)," and "Fetish." These sections, in turn, were divided into  
12 "Boys" and "Girls." Members could make "posts" to Website A, which  
13 included, among other things, the posting of previews of child  
14 pornography images and videos, links to child pornography, and  
15 comments on child pornography posted by other members.

16 3. At relevant times, prospective members could create a  
17 screen name and register an account. Website A members did not use  
18 their real names, but instead used screen names to mask their  
19 identities. Website A members followed security rules regarding  
20 remaining anonymous. To access Website A, for instance, members must  
21 have used a network that masked the Internet Protocol address of the  
22 user. At relevant times, Website A had over a thousand members.

23 4. At relevant times, members could ascend to a certain "rank"  
24 based on the extent of that member's participation on Website A,  
25 including the amount of child pornography the member shared on the  
26 forum. Some of the ranks included "VIP," "King of Producers," and  
27 "Club Member." Some ranks would allow access to additional parts of  
28



1 the website containing content that was inaccessible to lower-ranked  
2 members.

3 5. Defendant HARRELL used and posted under the screen name  
4 "soole" to participate on Website A. Defendant HARRELL joined  
5 Website A on or about February 12, 2016. Defendant HARRELL made  
6 approximately 155 posts to other Website A users. At relevant times,  
7 defendant HARRELL resided in and participated in the enterprise from  
8 Los Angeles County, within the Central District of California.

9 6. Defendant BRINSON used and posted under the screen name  
10 "king" to participate on Website A. Defendant BRINSON joined Website  
11 A on or about February 24, 2016. Defendant BRINSON made  
12 approximately 249 posts to other Website A users.

13 B. PREDICATE OFFENSES

14 7. Between in or about February 2016, and continuing through  
15 in or about June 2017, in Los Angeles County, within the Central  
16 District of California, and elsewhere, defendants HARRELL and  
17 BRINSON, acting in concert with each other and at least one other  
18 individual, including others known and unknown to the Grand Jury,  
19 engaged in a series of three or more felony violations of:

- 20 a. Title 18, United States Code, Section 2251(d)(1)(A),  
21 that is, each defendant knowingly made, printed,  
22 published, and caused to be made, printed, and  
23 published, any notice and advertisement seeking and  
24 offering to receive, exchange, buy, produce, display,  
25 distribute, and reproduce, a visual depiction, the  
26 production of which visual depiction involved the use  
27 of a minor engaging in sexually explicit conduct and  
28 such visual depiction was of such conduct, and such

notice and advertisement was transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and

- b. Title 18, United States Code, Section 2252(a)(2), that is, each defendant knowingly distributed a visual depiction using any means and facility of interstate and foreign commerce, where the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and the visual depiction was of such conduct,

by posting messages on Website A containing images of child pornography and web addresses and passwords needed to download child pornography images and videos, constituting three or more separate incidents and involving more than one victim, including, but not limited, to the following postings:

USER	DATES
Defendant HARRELL	November 3, 2016 January 12, 2017 April 15, 2017
Defendant BRINSON	August 1, 2016 November 19, 2016 January 25, 2017 June 10, 2017

COUNT TWO

[18 U.S.C. § 2251A(b)(1)]

[DEFENDANT HARRELL]

On or about September 24, 2016, in Los Angeles and San Bernardino Counties, within the Central District of California, and elsewhere, defendant ARLAN WESLEY HARRELL, aka "soole," "fritters," "kronos," and "the dread king," obtained custody and control of Minor Victim 11 with knowledge that as a consequence of obtaining custody, the minor would be portrayed in a visual depiction engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2)(A), and the minor traveled in and was transported in and affecting interstate and foreign commerce, and the offer was communicated and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer.



COUNT THREE

[18 U.S.C. §§ 2251(a), (e); 18 U.S.C. § 2(a)]

[ALL DEFENDANTS]

Between on or about September 24, 2016 and on or about May 28, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendants ARLAN WESLEY HARRELL, aka "soole," "fritters," "kronos," and "the dread king," and JOHN RICHARD BRINSON Jr., aka "king," "iamking," "boyanal," and "devinelover", each aiding and abetting the other, employed, used, persuaded, induced, enticed, and coerced Minor Victim 11 to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2)(A), for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and which visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

COUNT FOUR

[18 U.S.C. §§ 2251(a), (e); 18 U.S.C. § 2(a)]

[ALL DEFENDANTS]

Between on or about September 24, 2016 and on or about May 28, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendants ARLAN WESLEY HARRELL, aka "soole," "fritters," "kronos," and "the dread king," and JOHN RICHARD BRINSON Jr., aka "king," "iamking," "boyanal," and "devinelover", each aiding and abetting the other, employed, used, persuaded, induced, enticed, and coerced Minor Victim 3 to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2)(A), for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and which visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

COUNT FIVE

[18 U.S.C. §§ 2251(a), (e); 18 U.S.C. § 2(a)]

[ALL DEFENDANTS]

Between on or about September 24, 2016 and on or about May 28, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendants ARLAN WESLEY HARRELL, aka "soole," "fritters," "kronos," and "the dread king," and JOHN RICHARD BRINSON Jr., aka "king," "iamking," "boyanal," and "devinelover", each aiding and abetting the other, employed, used, persuaded, induced, enticed, and coerced Minor Victim 12 to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2)(A), for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and which visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.



COUNT SIX

[18 U.S.C. §§ 2251(a), (e); 18 U.S.C. § 2(a)]

[DEFENDANT BRINSON]

Between on or about December 19, 2016 and on or about May 28, 2017, within the Central District of California, and elsewhere, defendant JOHN RICHARD BRINSON Jr., aka "king," "iamking," "boyanal," and "devinelover," aiding and abetting another individual known to the Grand Jury, employed, used, persuaded, induced, enticed, and coerced Minor Victim 1 to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2)(A), for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and which visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

## COUNTS SEVEN THROUGH TWENTY-THREE

[18 U.S.C. §§ 2251(a), (e)]

[DEFENDANT HARRELL]

Beginning on or about the following dates, and continuing to on or about May 28, 2017, within the Central District of California, and elsewhere, defendant ARLAN WESLEY HARRELL, aka "soole," "fritters," "kronos," and "the dread king," employed, used, persuaded, induced, enticed, and coerced each of the following minors to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2)(A), for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and which visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce:

COUNT	DATE	VICTIM
SEVEN	In or about 2015	Minor Victim 5
EIGHT	In or about 2014	Minor Victim 6
NINE	In or about 2013	Minor Victim 7
TEN	In or about 2015	Minor Victim 8
ELEVEN	In or about 2013	Minor Victim 9
TWELVE	In or about 2015	Minor Victim 10

COUNT	DATE	VICTIM
THIRTEEN	In or about 2013	Minor Victim 13
FOURTEEN	In or about 2013	Minor Victim 14
FIFTEEN	In or about 2013	Minor Victim 15
SIXTEEN	In or about 2013	Minor Victim 16
SEVENTEEN	In or about 2013	Minor Victim 17
EIGHTEEN	In or about 2013	Minor Victim 18
NINETEEN	In or about 2013	Minor Victim 19
TWENTY	In or about 2013	Minor Victim 20
TWENTY-ONE	On or about May 19, 2017	Minor Victim 21
TWENTY-TWO	On or about May 19, 2017	Minor Victim 22
TWENTY-THREE	On or about May 19, 2017	Minor Victim 23



COUNT TWENTY-FOUR

[18 U.S.C. §§ 2252(a)(4)(B), (b)(2)]

[DEFENDANT HARRELL]

On or about May 28, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendant ARLAN WESLEY HARRELL, aka "soole," "fritters," "kronos," and "the dread king," knowingly possessed at least one matter which contained a visual depiction that had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which was produced using materials which had been mailed, shipped, and transported, by any means including by computer, the production of such visual depiction having involved the use of a minor, including minors who had not attained the age of 12 years, engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2)(A), and such visual depiction being of such conduct.

FORFEITURE ALLEGATION

[18 U.S.C. § 2253 and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 2253 and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction of the offenses set forth in any of Counts One through Twenty-Four of this Second Superseding Indictment.

2. Any defendant so convicted, shall forfeit to the United States of America the following property:

(a) All right, title, and interest in any visual depiction involved in any such offense, or any book, magazine, periodical, film videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received and involved in any such offense;

(b) All right, title, and interest in any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense;

(c) All right, title, and interest in any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property; and

(d) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraphs (a), (b), and (c).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18 Section 2253(b) and Title 28, United States

1 Code, Section 2461(c), any defendant so convicted shall forfeit  
2 substitute property, up to the total value of the property described  
3 in the preceding paragraph if, as the result of any act or omission  
4 of said defendant, the property described in the preceding paragraph,  
5 or any portion thereof: (a) cannot be located upon the exercise of  
6 due diligence; (b) has been transferred, sold to or deposited with a  
7 third party; (c) has been placed beyond the jurisdiction of the

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1 court; (d) has been substantially diminished in value; or (e) has  
2 been commingled with other property that cannot be divided without  
3 difficulty.

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5  
6 A TRUE BILL

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8 151  
9 Foreperson

10 NICOLA T. HANNA  
11 United States Attorney

12 *Brandon Fox*  
13 BRANDON D. FOX  
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